

SHER TREMONTE LLP

December 27, 2024

VIA ECF

Hon. Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

**Re: *United States v. Rui-Siang Lin*,
No. 24 Crim. 178 (CM)**

Dear Judge McMahon:

We represent Rui-Siang Lin, the defendant in the above-referenced matter. We write to the Court to respectfully request an exemption from the Protective Order, ECF No. 11. Specifically, Paragraph 4 of the Protective Order provides that the defense shall use Disclosure Material solely "for purposes of defending this action." *Id.*, ¶ 4. Further, Paragraph 11 of the Protective Order provides that the defense "shall not provide any Disclosure Material to any foreign persons or entities, except . . . if the Court authorizes such disclosure on a case-by-case basis." *Id.*, ¶ 11. In this instance, we respectfully request that the Court authorize disclosure of **Exhibit A**,¹ which we are separately providing under seal by email to the Court and counsel for the government, to Taiwanese counsel for Mr. Lin's mother. The basis for this request is the same as that stated in our October 9, 2024 letter to the Court (ECF No. 19). The government does not object to this request. We have already provided to Taiwanese counsel a copy of the Protective Order and obtained their assurance that they will abide by all of its terms.

Respectfully submitted,

/s/ Noam Biale

Noam Biale

Katie Renzler

Attorneys for Rui-Siang Lin

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¹ This document is not designated as Attorney's Possession Only Material or Attorney's Eyes Only Material pursuant to the Protective Order. See ECF No. 11, ¶¶ 2-3.